

State of Minnesota
County of Ramsey

District Court
2nd Judicial District

Prosecutor File No.
Court File No.

0620418593
62-CR-19-6527

State of Minnesota,

Plaintiff,

vs.

HAMZE MOHAMED DAOD DOB: [REDACTED]

[REDACTED]

[REDACTED]

Defendant.

COMPLAINT

Warrant

☒ Amended

The Complainant submits this complaint to the Court and states that there is probable cause to believe Defendant committed the following offense(s):

COUNT I

Charge: Theft-Take/Use/Transfer Movable Prop-No Consent

Minnesota Statute: 609.52.2(a)(1), with reference to: 609.52.3(1)

Maximum Sentence: 20 years or \$100,000, or both

Offense Level: Felony

Offense Date (on or about): 08/27/2019

Control #(ICR#): 19192247

Charge Description: On or about August 27, 2019, in the County of Ramsey, Minnesota, Hamze Mohamed Daod did intentionally, without claim of right or consent of the owner or person in lawful possession, take, transfer, or retain possession of movable property consisting of a firearm and with intent to deprive the owner permanently of possession.

COUNT II

Charge: Theft-Take/Use/Transfer Movable Prop-No Consent

Minnesota Statute: 609.52.2(a)(1)

Maximum Sentence: 10 years or \$20,000, or both (over \$5,000): OR (over \$1,000): 5 years or \$10,000 or both OR (over \$500-\$1,000 and prior conviction): 5 years or \$10,000, or both OR (less than \$1,000 but risk of bodily harm): 3 years or \$5,000

Offense Level: Felony

Offense Date (on or about): 08/27/2019

Control #(ICR#): 19192247

Charge Description: On or about August 27, 2019, in Ramsey County, Minnesota, Hamze Mohamed Daod intentionally, without claim of right or consent of the owner or person in lawful possession, and with intent to deprive the owner permanently of possession, took, transferred, or retained possession of movable property consisting of a firearm and with intent to deprive the owner permanently of possession.

COUNT III

Charge: Financial Transaction Card Fraud-Use-No Consent

Minnesota Statute: 609.821.2(1), with reference to: 609.821.3(a)(1)(iii)

Maximum Sentence: 5 years or \$10,000, or both

Offense Level: Felony

Offense Date (on or about): 08/27/2019

Control #(ICR#): 19192247

Charge Description: On or about August 27, 2019, in the County of Ramsey, Minnesota, Hamze Mohamed Daod did, without the consent of the cardholder, and knowing the cardholder had not given consent, use a financial transaction card to obtain or attempt to obtain property of another of a value of, or the aggregate amount of the transactions was, more than \$250.

STATEMENT OF PROBABLE CAUSE

On or about August 28, 2019, at about 10:30 am, MWC, born 1948, parked outside the YWCA, 375 Selby Ave., St. Paul, **Ramsey County**, MN, left his **\$600** Glock handgun and wallet in the center console of his vehicle, and entered the locked/secured YWCA. MWC left his duffel bag on an open shelf near the front entrance of the YWCA. MWC then went further inside the YWCA and exercised.

At about 11:30 am, MWC noticed his duffel bag lying on the floor at the bottom of the shelves by the front entry. He checked the contents of his duffel bag and discovered his vehicle keys and **\$800** cell phone had been stolen.

MWC went outside and checked his vehicle, [REDACTED] and saw his vehicle keys lying on the seat. MWC's wallet was missing from the vehicle. It had contained **\$350** in cash, two credit cards, and two forms of retirement identification. MWC said his \$600 Glock handgun was missing from the center console.

Police learned witnesses in the YWCA had seen a suspicious young male inside the YWCA at the relevant time. [REDACTED], a staff member witness, described the suspicious male as a black male, possibly Somalian, older teens, thin, about 5'8" to 5'9" tall, dark skinned, short curly hair, wearing a black Nike baseball cap, and black sports shirt with sleeves.

Witness [REDACTED] provided a similar description of the suspicious young male he saw going through MWC's black duffel bag by the shelf inside the YWCA.

Loss prevention staff at Target, 1300 University Ave., St. Paul, **Ramsey County**, MN, soon became involved and provided surveillance images of the same young male purchasing ten (10) \$200 gift cards using MWC's stolen credit card(s) in the self-check-out area of Target. In addition to fraudulently charging the \$2,000 to MWC's credit card(s), the suspect also charged an extra \$60 for the \$6.00 purchase fee for each gift card. The total the male suspect fraudulently charged to MWC's credit card(s) was **\$2,060.00**.

Loss prevention later provided video of the suspect getting out of a red or burgundy Ford Focus near 1300 University and walking into Target. The driver stayed with the red or burgundy Ford Focus and then, upon seeing the suspect exit Target, drove toward him and picked him up.

Surveillance images show the suspect was wearing a black hat with Nike "swoosh" emblems on front and back, black Nike flip flops with a Nike "swoosh" on top, black athletic pants with white stripes down the sides, and a dark knit shirt with sleeves.

Officers viewed the images of the young male suspect taken by Target and positively identified him as **HAMZE MOHAMED DAOD, DOB** [REDACTED] They knew DAOD lived at [REDACTED]

Officers maintained surveillance of DAOD's and his mother's home at [REDACTED] while a Search Warrant was prepared and signed. The surveillance officers soon saw DAOD and two friends pull up to his mother's residence in the red Ford Fusion. The officers took DAOD into custody and placed him in their backseat.

Other officers then arrived and executed the Search Warrant. Only DAOD's mother was in the home. Officers recovered only DAOD's MN Instruction Permit, mail addressed to DAOD, and black Adidas shorts

with white stripes.

During a Mirandized interview, DAOD repeatedly denied having anything to do with the theft of items from the YWCA at 375 Selby Ave. or thefts from other gyms which occurred over the last six or so months. He claimed he had not even set foot in any gyms.

NOTICE: Pursuant to Minnesota Statute 609.49, subd. 1 (a) A person charged with or convicted of a felony and released from custody, with or without bail or recognizance, who intentionally fails to appear when required after having been notified that a failure to appear for a court appearance is a criminal offense, or after having been released on an order or condition that the release personally appear when required with respect to the charge or conviction, is guilty of a crime for failure to appear and may be sentenced to not more than one-half of the maximum term of imprisonment or fine, or both, provided for the underlying crime for which the person failed to appear, but this maximum sentence shall, in no case, be less than a term of imprisonment of one year and one day or a fine of \$1,500, or both.

SIGNATURES AND APPROVALS

Complainant requests that Defendant, subject to bail or conditions of release, be:
(1) arrested or that other lawful steps be taken to obtain Defendant's appearance in court; or
(2) detained, if already in custody, pending further proceedings; and that said Defendant otherwise be dealt with according to law.

Complainant declares under penalty of perjury that everything stated in this document is true and correct. Minn. Stat. § 358.116; Minn. R. Crim. P. 2.01, subds. 1, 2.

Complainant

Anthony Jacob Nikula
Sergeant
367 Grove St
St Paul, MN 55101
Badge: 269

Electronically Signed:
09/03/2019 12:57 PM
Ramsey County, Minnesota

Being authorized to prosecute the offenses charged, I approve this complaint.

Prosecuting Attorney

Elaine Ashbaugh
345 Wabasha Street N
Suite 120
St Paul, MN 55102
(651) 266-3222

Electronically Signed:
09/03/2019 10:47 AM

FINDING OF PROBABLE CAUSE

From the above sworn facts, and any supporting affidavits or supplemental sworn testimony, I, the Issuing Officer, have determined that probable cause exists to support, subject to bail or conditions of release where applicable, Defendant's arrest or other lawful steps be taken to obtain Defendant's appearance in court, or Defendant's detention, if already in custody, pending further proceedings. Defendant is therefore charged with the above-stated offense(s).

☐ SUMMONS

THEREFORE YOU, THE DEFENDANT, ARE SUMMONED to appear on _____, _____ at _____ AM/PM before the above-named court at 15 W Kellogg Blvd, St Paul, MN 55102 to answer this complaint.

IF YOU FAIL TO APPEAR in response to this SUMMONS, a WARRANT FOR YOUR ARREST shall be issued.

☒ WARRANT

To the Sheriff of the above-named county; or other person authorized to execute this warrant: I order, in the name of the State of Minnesota, that the Defendant be apprehended and arrested without delay and brought promptly before the court (if in session), and if not, before a Judge or Judicial Officer of such court without unnecessary delay, and in any event not later than 36 hours after the arrest or as soon as such Judge or Judicial Officer is available to be dealt with according to law.

☐ *Execute in MN Only*

☒ *Execute Nationwide*

☐ *Execute in Border States*

☐ ORDER OF DETENTION

Since the Defendant is already in custody, I order, subject to bail or conditions of release, that the Defendant continue to be detained pending further proceedings.

Bail: \$40,000.00

Conditions of Release:

This complaint, duly subscribed and sworn to or signed under penalty of perjury, is issued by the undersigned Judicial Officer as of the following date: September 3, 2019.

Judicial Officer

Kelly Olmstead
Judge

Electronically Signed: 09/03/2019 04:39 PM

Sworn testimony has been given before the Judicial Officer by the following witnesses:

**COUNTY OF RAMSEY
STATE OF MINNESOTA**

State of Minnesota

Plaintiff

vs.

Hamze Mohamed Daod

Defendant

LAW ENFORCEMENT OFFICER RETURN OF SERVICE
I hereby Certify and Return that I have served a copy of this Warrant upon the Defendant herein named.

Signature of Authorized Service Agent:

DEFENDANT FACT SHEET

Name: Hamze Mohamed Daod
DOB: [REDACTED]
Address: [REDACTED]

Alias Names/DOB:
SID: MN18AF7645
Height:
Weight: 0lbs.
Eye Color:
Hair Color:
Gender:
Race:
Fingerprints Required per Statute: Yes
Fingerprint match to Criminal History Record: Yes
Driver's License #:
Alcohol Concentration:

STATUTE AND OFFENSE GRID

Cnt Nbr	Statute Type	Offense Date(s)	Statute Nbrs and Descriptions	Offense Level	MOC	GOC	Controlling Agencies	Case Numbers
1	Charge	8/27/2019	609.52.2(a)(1) Theft-Take/Use/Transfer Movable Prop-No Consent	Felony	TE155		MN0620900	19192247
	Penalty	8/27/2019	609.52.3(1) Theft - Firearm or property value over \$35,000	Felony	TE155		MN0620900	19192247
2	Charge	8/27/2019	609.52.2(a)(1) Theft-Take/Use/Transfer Movable Prop-No Consent	Felony	TT021		MN0620900	19192247
3	Charge	8/27/2019	609.821.2(1) Financial Transaction Card Fraud-Use-No Consent	Felony	U155B		MN0620900	19192247
	Penalty	8/27/2019	609.821.3(a)(1)(iii) Finance Trans Card Fraud-Value \$251 - \$2,500	Felony	U155B		MN0620900	19192247